



# CALIFORNIA FARM BUREAU FEDERATION

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Sent electronically

[www.whitehouse.gov/administration/eop/ceq/initiatives/nepa](http://www.whitehouse.gov/administration/eop/ceq/initiatives/nepa)

January 27, 2012

The Council on Environmental Quality  
ATTN: Horst Greczmiel, Associate Director  
National Environmental Policy Act Oversight  
722 Jackson Place NW  
Washington, DC 20503

***Re: Improving the Process for Preparing Efficient and Timely Environmental  
Reviews under the National Environmental Policy Act***

Dear Mr. Greczmiel:

The California Farm Bureau Federation ("Farm Bureau") is a non-governmental, non-profit, voluntary membership California corporation whose purpose is to protect and promote agricultural interests throughout the state of California and to find solutions to the problems of the farm, the farm home, and the rural community. Farm Bureau is California's largest farm organization, comprised of 53 county Farm Bureaus currently representing more than 74,000 agricultural, associate, and collegiate members in 56 counties. Farm Bureau strives to protect and improve the ability of farmers and ranchers engaged in production agriculture to provide a reliable supply of food and fiber through responsible stewardship of California's resources.

Farm Bureau appreciates the opportunity to provide comments on the Draft National Environmental Policy Act ("NEPA") Guidance entitled "Improving the Process for Preparing Efficient and Timely Environmental Reviews under the National Environmental Policy Act" ("Draft NEPA Guidance"). Farm Bureau recognizes and commends the Council on Environmental Quality's ("CEQ") efforts to make NEPA more efficient and timely and offers the following comments.

### Sound Science

Sound science should underpin sound environmental planning, policy development, and management. Critical components of the NEPA process, especially with regard to analysis of environmental effects and impacts, are sound scientific analysis based on the best scientific and commercial data available. Given the fundamental need

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to apply and base determinations on sound scientific principles, Farm Bureau urges the CEQ to emphasize the importance of environmental review documents based on the best scientific and commercial data available.

#### Concise Documentation

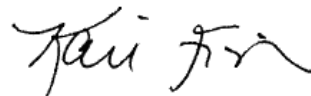
Farm Bureau agrees that all NEPA environmental review documents should “focus on significant issues,” be “no longer than necessary to comply with NEPA and the other legal and regulatory requirements being addressed . . . , and [] provide decision makers and the public with the information they need to assess the significant environmental effects of the action under review.” (Draft NEPA Guidance, pp. 4-5.) In order to provide decision makers and the public with the proper amount of information necessary to make appropriate assessments, the CEQ Regulations should deemphasize specific page limitations. Rather than a one-size-fits-all limit, the length of the documents should be left to the discretion of the agency.

#### Proper Impact Analysis

While recognizing the desire for concise environmental review documents, Farm Bureau cautions against conclusory statements, especially with regard to impacts analysis and determinations of significance. As stated within the Draft NEPA Guidance, “Impacts should be discussed in proportion to their significance, if the issues are not deemed significant there should be only enough discussion to show why more study is not warranted.” (Draft NEPA Guidance, p. 4.) While significant issues logically warrant more analysis than those deemed insignificant, analysis on insignificant issues must be thorough and complete. Conclusory statements alone hinder decision makers and the public from understanding the scope of the project and its potential environmental impacts or significance. Thus, all aspects of environmental analysis, discussed in proportion to their significance, must be appropriate in scope and detail so that informed decision making to occur.

Thank you for the opportunity to provide our comments and concerns. We look forward to further involvement and discussion with the CEQ on efforts to make NEPA more efficient and timely.

Very truly yours,

A handwritten signature in black ink, appearing to read "Kari Fisher", written in a cursive style.

Kari E. Fisher  
Associate Counsel

KEF/pkh